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Director of Personnel

Comptroller

SECRET

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No Change in Status _____
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classification*

Proposed Revision of _____ - Civil Service
Retirement - RCS Jobs 1522 BT and 1523 BT

REF : Your Memorandum to the DD/P, DD/I and Comptroller dated
10 May 1956, Same Subject

1. This Office concurred in the subject regulations without comment on 9 March 1956.

2. The referenced memorandum is a rebuttal to the arguments advanced by the Office of General Counsel that the subject regulations should include "only the matters concerning retirement peculiar to Agency employees because of cover, security, or other problems faced by the Agency." (Underscoring added). One hundred per cent of the Agency employees are concerned with security problems.

3. This Office does not concur in the reasoning advanced by the Office of General Counsel. It is the understanding of this Office that Agency regulations should be complete statements of facts, directives, policy, instructions, and essential procedures, capable of standing on their own without reference to regulations or publications of other Government departments or establishments. Regulations originated by this Office have consistently adhered to this understanding.

4. If the concept of the Office of General Counsel were adopted, the regulations of the Agency might well develop into a little more than an index to other publications. This would involve purchasing vast supplies of pamphlets and hundreds of publications, creating problems relating to procurement, storage, filing, and distribution.

5. The Office of General Counsel has apparently overlooked one important fact. Certainly the Agency would not consider furnishing all the required Government publications to field installations to carry out the concept advanced by the Office of General Counsel. To do so

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to have been a wise one and should be constantly followed. This course will doubtless be more economical and result in more effective administration.

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6. This Office concurs in the statements set forth in the referenced memorandum.

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E. R. SAUNDERS

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